

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

UNITED STATES OF AMERICA,

Plaintiff,

v.

JUAN LAJARA,

Defendant.

Case No. 1:00-cr-00216-JSR

**NOTICE OF EMERGENCY MOTION FOR COMPASSIONATE RELEASE
PURSUANT TO 18 U.S.C. § 3582(c)(1)(A)(i)**

PLEASE TAKE NOTICE that upon the accompanying legal memorandum, declaration and exhibits, and pursuant to the newly amended 18 U.S.C. § 3582(c)(1)(A)(i), Defendant Juan Lajara will and hereby does move before the Honorable Jed S. Rakoff of the United States District Court for the Southern District of New York, 500 Pearl Street, New York, New York, for an order shortening his current prison release date of November 10, 2022 to time served, or alternatively to order that he serve out the remainder of his sentence on home confinement, so he can avoid the Covid-19 outbreak at the Metropolitan Detention Center, Brooklyn, due to his severe underlying medical conditions.

Dated: New York, New York
February 11, 2021

Respectfully submitted,

WILLKIE FARR & GALLAGHER LLP

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